

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,
Plaintiff,**

V.

**The City of Nashua, *et al.*,
Defendants.**

Civil Action No. 1:22-cv-00326-LM

WITNESS LIST OF THE DEFENDANTS,
STEVEN A. BOLTON AND CELIA K. LEONARD

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following witness list:

1. The defendants Bolton and Leonard will call the following witnesses to testify at trial:

Steven A. Bolton
Celia K. Leonard
Mindy Lloyd
Michael Carignan, retired NPD Chief

2. The defendants Bolton and Leonard may call the following witnesses:

Jesse Neumann
Timothy Roach, NPD Officer
Brian Kenney, NPD Deputy Chief
Megan Caron
Manuela Perry
Christopher Caron, NPD Officer

The defendants Bolton and Leonard reserve the right to call any and all of the plaintiff's witnesses, and reserve the right to amend this witness list up to, and including, the time of trial.

Respectfully submitted,

Steven A. Bolton,

By his Counsel,

UPTON & HATFIELD, LLP,

Date: April 8, 2025

/s/ Russell F. Hilliard

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and

CEILA K. LEONARD,

By her attorneys

**CULLEN COLLIMORE SHIRLEY,
PLLC,**

Dated: April 8, 2025

/s/ Brian J.S. Cullen

Brian J.S. Cullen (Bar No. 11265)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded on this day to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard

Russell F. Hilliard